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March 19, 2025

**VIA ECF AND E-MAIL**

Hon. Jennifer H. Rearden  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1010  
New York, NY 10007  
ReardenNYSDChambers@nysd.uscourts.gov

Application GRANTED. Defendant HUSA Management Co., LLC's deadline to respond to Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s Cross-Claim is extended to **May 2, 2025**. Defendants Rainbow Apparel of America, Inc. and A.I.J.J. Enterprises, Inc.'s deadline to respond to Defendants Commonwealth Local Development Corp. and HUSA Management Co., LLC's Cross-Claim is extended to **May 2, 2025**.

The Clerk of Court is directed to terminate ECF No. 36.

SO ORDERED.

A handwritten signature in blue ink that reads 'Jennifer H. Rearden'.

Jennifer H. Rearden, U.S.D.J.  
Dated: March 24, 2025

**Re: *Freeman v. Commonwealth Local Development Corp., et al.,***  
**Civil Action No.: 1:24-cv-08823**

Dear Judge Rearden:

This firm represents Defendants, HUSA Management Co. and Commonwealth Development Corp. (together "HUSA") in the above-referenced matter. We write jointly with Defendants, Rainbow Apparel of America, Inc. (incorrectly referenced in the Complaint as "Rainbow USA Inc.") and A.I.J.J. Enterprises, Inc. (together "Rainbow"), to respectfully request that the Court extend the respective deadlines for Rainbow and HUSA to respond to each other's cross-claims up to and including May 2, 2025.

By way of brief background, on February 3, 2025, Rainbow filed its answer with cross-claims (ECF No. 28), making HUSA's response due on or before February 24, 2025. *See* Fed. R. Civ. P. 12(a)(1)(B). On February 18, 2025, HUSA filed its answer with cross-claims (ECF No. 30), making Rainbow's response due on or before March 11, 2025. *See* Fed. R. Civ. P. 12(a)(1)(B). On February 19, 2025, Rainbow's counsel submitted a joint letter motion to this Court requesting an extension of time for HUSA to respond to Rainbow's cross-claims until March 26, 2025 and for Rainbow to respond to HUSA's cross-claims until April 10, 2025. This request was granted.

However, the parties have now been referred to mediation in this matter and same has been scheduled for April 25, 2025. Thus, Defendants' counsel have agreed that it would be fruitful to extend such cross-claim response deadlines until after mediation, should the matter not settle at mediation. Furthermore, Defendants' counsel have been in discussions regarding certain responsibilities and obligations under the lease documents that may bear on how Defendants respond to the cross-claims directed against them. Thus, for these reasons, HUSA and Rainbow

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jointly request additional time to respond to each other's cross-claims up to and including May 2, 2025 (one week post-mediation, should the matter not settle at mediation).

This application is being filed in good faith, and not to cause undue delay. This extension, if granted, would not affect any scheduled dates or deadlines. There are currently no scheduled appearances before the Court.

We thank this Court for its time and attention to this matter.

Very truly yours,

WOOD, SMITH, HENNING & BERMAN LLP

By: \_\_\_\_\_  
MEGHAN A. DIBBINI

cc: All counsel of record (via ECF)